

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

v.

IAN W. MCMAHON,

Defendant.

)  
)  
) Criminal Action No. 18-30  
) **REDACTED**  
)  
)  
)

FILED  
U.S. DISTRICT COURT  
DISTRICT OF DELAWARE  
2018 APR 24 PM 2:26

INDICTMENT

The Grand Jury for the District of Delaware charges that:

DEFINITIONS

For purposes of this indictment, the term "child pornography" is defined in Title 18, United States Code, Section 2256(8)(A) and includes any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct. Moreover, for purposes of this indictment, the term "sexually explicit conduct" is defined in Title 18, United States Code, Section 2256(2)(A), and includes, but is not limited to, actual or simulated sexual intercourse and lascivious exhibition of the genitals or pubic area of any person.

COUNT ONE

(Distribution of Child Pornography)

From on or about December 1, 2017, through on or about February 28, 2018, in the District of Delaware, and elsewhere, the defendant, **IAN W. MCMAHON**, did knowingly distribute child pornography that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, including by computer, in violation of Title 18,

United States Code, Sections 2252A(a)(2)(A), 2256(2)(A), and 2256(8)(A).

**COUNT TWO**

**(Receipt of Child Pornography)**

From on or about December 1, 2017, through on or about February 28, 2018, in the District of Delaware, and elsewhere, the defendant, **IAN W. MCMAHON**, did knowingly receive child pornography that had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(2)(A), 2256(2)(A), and 2256(8)(A).

**COUNT THREE**

**(Possession of Child Pornography)**

On or about February 28, 2018, in the District of Delaware, the defendant, **IAN W. MCMAHON**, did knowingly possess material that contained an image of child pornography that involved a prepubescent minor who had not attained 12 years of age, and which had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce or in or affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Sections 2252A(a)(5)(B), 2252A(b)(2), 2256(2)(A), and 2256(8)(A).

**NOTICE OF FORFEITURE**

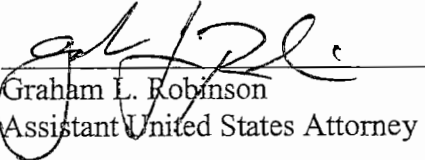
Upon conviction for violating Counts One, Two, and Three of the Indictment, the defendant, **IAN W. MCMAHON**, shall forfeit to the United States any and all matter that contains visual depictions of child pornography or visual depictions that are or appear to be of minors engaged in sexually explicit conduct, that were produced in violation thereof; and any

and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violations, including but not limited to all electronic devices seized from **MCMAHON'S** person and vehicle on February 28, 2018, pursuant to Title 18, United States Code, Sections 1467, 2253, and 2428.

A<sub>n</sub> TRUE BILL:

Foreperson

DAVID C. WEISS  
UNITED STATES ATTORNEY

By:   
Graham L. Robinson  
Assistant United States Attorney

Dated: April 24, 2018